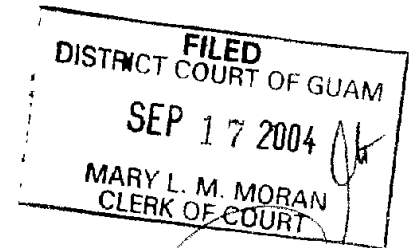


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Attorneys for Plaintiffs Alan Sadhwani, et al.

**IN THE UNITED STATES  
DISTRICT COURT OF GUAM**

ALAN SADHWANI, LAJU SADHWANI, )  
and K. SADHWANI'S INC., a Guam )  
corporation, )

Plaintiffs, )

vs. )

HONGKONG AND SHANGHAI )  
BANKING CORPORATION, LTD., a )  
Foreign corporation, )  
JOHN DOE I through JOHN DOE X, )  
Defendants. )

CIVIL CASE NO. 03-00036

**SECOND DECLARATION OF  
ANITA P. ARRIOLA IN  
SUPPORT OF PLAINTIFFS'  
MOTION TO COMPEL  
FURTHER ANSWERS TO  
DEPOSITION QUESTIONS; TO  
RE-DEPOSE FREDERICK  
GRANILLO; FOR PRODUCTION  
OF DOCUMENTS; AND FOR  
SANCTIONS**

ANITA P. ARRIOLA declares:

1. I am one of the attorneys for plaintiffs Alan Sadhwani, et al. in the above-captioned matter. I make this declaration in support of plaintiffs' Opposition to Defendant Hongkong and Shanghai Banking Corporation, Ltd.'s ("HSBC") motion to compel further answers to deposition questions; to re-depose Frederick Granillo; for production of documents; and for sanctions. I have personal knowledge of the facts contained herein.

2. On August 9, 2004, I took the deposition of Catherine Champaco. Ms. Champaco was previously an employee at HSBC and she was responsible for the confidentiality policies and

procedures for the bank. Plaintiffs previously served a Fourth Set of Request for Production of Documents to HSBC seeking the bank's confidentiality policies and procedures. HSBC produced some documents but the deposition of Ms. Champaco revealed that HSBC had not provided numerous other documents. When I requested these additional documents that were mentioned in Ms. Champaco's deposition, eventually HSBC produced an additional two binders of documents.

I declare under penalty of perjury under the laws of Guam and the laws of the United States that the foregoing is true and correct.

Dated this 17th day of September, 2004.

  
ANITA P. ARRIOLA

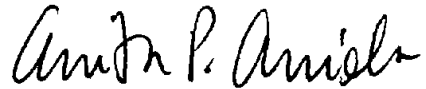
ARRIOLA, COWAN & ARRIOLA, HAGATNA, GUAM 96910

**CERTIFICATE OF SERVICE**

I, ANITA P. ARRIOLA, hereby certify that on September 17, 2004, I caused to be served via hand delivery, **SECOND DECLARATION OF ANITA P. ARRIOLA IN SUPPORT OF PLAINTIFFS' MOTION TO COMPEL FURTHER ANSWERS TO DEPOSITION QUESTIONS; TO RE-DEPOSE FREDERICK GRANILLO; FOR PRODUCTION OF DOCUMENTS; AND FOR SANCTIONS** to:

**Jacques G. Bronze, Esq.  
Bronze & Tang, P.C.  
2nd Floor, BankPacific Building  
825 S. Marine Drive  
Tamuning, Guam 96913**

Dated this 17th day of September, 2004.



**ANITA P. ARRIOLA**

ARRIOLA, COWAN & ARRIOLA, HAGATNA, GUAM 96910